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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

Related Docket Nos. 373, 404, and 430

**NOTICE OF WITHDRAWAL OF THE DEBTORS'
MOTION TO ESTABLISH PROCEDURES AND A SCHEDULE FOR ESTIMATING
THE AMOUNT OF THE FTX DEBTORS' CLAIMS AGAINST THE DEBTORS UNDER
BANKRUPTCY CODE SECTIONS 105(a) AND 502(c) AND BANKRUPTCY RULE 3018**

PLEASE TAKE NOTICE that, on January 19, 2023 (the "Petition Date"), Genesis Global Holdco, LLC and its affiliates Genesis Global Capital, LLC and Genesis Asia Pacific Pte. Ltd., as debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors," and the cases, the "Chapter 11 Cases"), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* (the "Bankruptcy Code") with the United States Bankruptcy Court for the Southern District of New York (the "Court").

PLEASE TAKE FURTHER NOTICE that, on June 1, 2023, the Debtors filed the *Motion to Establish Procedures and a Schedule for Estimating the Amount of the FTX Debtors' Claims Against the Debtors Under Bankruptcy Code Sections 105(a) and 502(c) and Bankruptcy Rule 3018* (ECF No. 373) (the "Estimation Motion"), by which the Debtors proposed to establish procedures to estimate the claims filed in the Chapter 11 Cases by FTX Trading Ltd.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (or equivalent identifier), are: Genesis Global Holdco, LLC ("Holdco") (8219); Genesis Global Capital, LLC ("GGC") (8564); and Genesis Asia Pacific Pte. Ltd. ("GAP") (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

and its affiliated debtors and debtors in possession (collectively, the “FTX Debtors”) in the jointly administered Chapter 11 proceedings pending in the United States Bankruptcy Court for the District of Delaware, Case No. 22-11068 (the “FTX Chapter 11 Cases”). On June 8, 2023, the FTX Debtors filed an objection to the Estimation Motion (ECF No. 404), and on June 13, 2023, the Debtors filed a reply in support of the Estimation Motion (ECF No. 430).

PLEASE TAKE FURTHER NOTICE that, on August 17, 2023, the Debtors filed the *Genesis Debtors’ Motion Pursuant to Federal Rule of Bankruptcy Procedure 9019(A) for Entry of an Order Approving Settlement Agreement with FTX Debtors* (ECF No. 603) (the “Settlement Motion”), in which Debtors sought approval of a settlement (the “Settlement Agreement”) among (i) the Genesis Debtors and their non-debtor affiliates and subsidiaries and (ii) the FTX Debtors and the FTX Debtors’ non-debtor affiliates and subsidiaries. The Settlement Agreement provided, *inter alia*, that, upon its effectiveness, the Debtors would withdraw the Estimation Motion.

PLEASE TAKE FURTHER NOTICE that, on September 6, 2023, the Settlement Agreement was approved in the FTX Chapter 11 Cases by the United States Bankruptcy Court for the District of Delaware (the “FTX Court”). See Order, *In re FTX Trading Ltd.*, No. 22-11068 (Bankr. D. Del. Sept. 6, 2023) (ECF No. 2433).

PLEASE TAKE FURTHER NOTICE that, on October 6, 2023, this Court issued the *Memorandum of Decision* (ECF No. 781), and on October 17, 2023, the Court issued the *Order Approving Settlement Agreement Between the Genesis Entities and the FTX Entities* (ECF No. 806), granting the relief requested in the Settlement Motion and approving the Settlement Agreement.

PLEASE TAKE FURTHER NOTICE that pursuant to the terms thereof, the Settlement Agreement became effective on November 1, 2023.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Settlement Agreement, the Debtors hereby withdraw the Estimation Motion with prejudice.

Dated: November 17, 2023
New York, New York

/s/ Luke A. Barefoot

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